

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

FILED
U.S. DISTRICT COURT
FORT WORTH DIVISION
2016 AUG -8 PM 3:45
CLERK OF COURT

UNITED STATES OF AMERICA

v.

Case No. 4:16-CR-132-A

CHARLES BEN BOUNDS (01)
BILLY FRED GENTRY, JR. (05)
a/k/a "Fred Gentry"
KEVIN KYLE KILLOUGH (07)
a/k/a "Kilo"
ROGER WAYNE LANGSTON (08)
a/k/a "Big Country"
JAMES LAXSON (09)
a/k/a "Monster"
BILLY RAY SKAGGS (15)
DREW JUSTICE WINDSOR (18)
a/k/a "Justice Windsor"
MICHAEL CLAY HEASLET (24)
NICOLE CYNTHIA HERRERA (25)
a/k/a "Nikki Single"
TRAE SHORT (29)
a/k/a "Twig"
ADRIAN BLAIR WALLACE (31)

GOVERNMENT'S WITNESS LIST

Witness Name

Sworn/Testified

Subject Matter of Testimony

1. Task Force Officer Cy Crum
Drug Enforcement Agency

_____/_____
Task Force Officer Crum is one of the Case Agents. He is a probable fact and expert witness. He may testify to his investigation of the defendants' activities during the offense alleged in the Indictment. He may also testify about narcotics distribution in general, including the interpretation of drug slang/code.

Witness Name	Sworn/Testified Subject Matter of Testimony
2. Special Agent Brian Finney Drug Enforcement Agency	_____/_____ Special Agent Finney is one of the Case Agents. He is a probable fact and expert witness. He may testify to his investigation of the defendants' activities during the offense alleged in the Indictment. He may also testify about narcotics distribution in general, including the interpretation of drug slang/code
3. Special Agent Mike McCurdy Department Homeland Security	_____/_____ Special Agent McCurdy is one of the Case Agents. He is a probable fact and expert witness. He may testify to his investigation of the defendants' activities during the offense alleged in the Indictment. He may also testify about narcotics distribution in general, including the interpretation of drug slang/code
4. Task Force Officer Steve Lair Department Homeland Security	_____/_____ Task Force Officer Steve Lair is a probable expert witness. He may testify to his knowledge of the structure and practices of the of the Aryan Brotherhood of Texas, as well as the role of its members.
5. Audra Bowden	_____/_____ Ms. Bowden is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
6. Tiffany Billingsley	_____/_____ Ms. Billingsley is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.

Witness Name	Sworn/Testified Subject Matter of Testimony
7. Tiffany Bradberry	_____/_____ Ms. Bradberry is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
8. Alisha Feeney	_____/_____ Ms. Feeney is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
9. Jessica Judge	_____/_____ Ms. Judge is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy
10. Sarah Kirkpatrick	_____/_____ Ms. Kirkpatrick is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
11. Amanda Means	_____/_____ Ms. Means is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
12. Royce Newton	_____/_____ Mr. Newton is a probable fact witness. He may testify about prior drug transactions he conducted with defendants and his knowledge of the charged conspiracy.

Witness Name	Sworn/Testified Subject Matter of Testimony
13. Eric Overstreet	<u> </u> / <u> </u> Mr. Overstreet is a probable fact witness. He may testify about prior drug transactions he conducted with defendants and his knowledge of the charged conspiracy.
14. Leslie Payne	<u> </u> / <u> </u> Ms. Payne is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
15. Gavin Seguin	<u> </u> / <u> </u> Mr. Seguin is a probable fact witness. He may testify about prior drug transactions he conducted with defendants and his knowledge of the charged conspiracy.
16. Chad Shulka	<u> </u> / <u> </u> Mr. Shulka is a probable fact witness. He may testify about prior drug transactions he conducted with defendants and his knowledge of the charged conspiracy.
17. Mandy Turner	<u> </u> / <u> </u> Ms. Turner is a probable fact witness. She may testify about prior drug transactions she conducted with defendants and her knowledge of the charged conspiracy.
18. Angela M. Cassady Drug Enforcement Administration	<u> </u> / <u> </u> Ms. Cassady is a forensic chemist with the Drug Forensic Chemist Enforcement Agency. She is a probable expert witness who will testify as to tests she performed on exhibits seized in the case.

Witness Name	Sworn/Testified Subject Matter of Testimony
19. Angel E. Ramirez Supervisory Chemist Drug Enforcement Administration	_____/_____ Ms. Ramirez is the supervisory chemist with the Drug Enforcement Agency. She is an expert witness who may testify about tests performed on exhibits seized in this case.
20. Courtney Wassung Forensic Chemist Texas DPS Garland Crime Laboratory	_____/_____ Wassung is a forensic chemist with Texas Department of Public Safety Garland Crime Laboratory. Wassung is a probable fact and expert witness who will testify as to tests she performed on exhibit(s) seized in the case.
21. Officer S. Grigg Farmers Branch Police Department	_____/_____ Officer Grigg is a Police Officer with the Farmers Branch Police Department. Officer Grigg is a probable fact witness who will testify about his encounter with defendant Killough.
22. Officer D. Rubin Farmers Branch Police Department	_____/_____ Officer Rubin is a Police Officer with the Farmers Branch Police Department. Officer Rubin is a probable fact witness who will testify about his encounter with defendant Killough.
23. Officer R. Nichols Fort Worth Police Department	_____/_____ Officer Nichols is a Police Officer with the Fort Worth Police Department. Officer Nichols is a probable fact witness who will testify about his encounter with defendant Wallace.
24. Officer Allen Fort Worth Police Department	_____/_____ Officer Allen is a Police Officer with the Fort Worth Police Department. Officer Allen is a probable fact witness who will testify about his encounter with defendant Wallace.

Witness Name	Sworn/Testified Subject Matter of Testimony
25. Officer Novak Fort Worth Police Department	_____/_____ Officer Novak is a Police Officer with the Fort Worth Police Department. Officer Novak is a probable fact witness who will testify about his encounter with defendant Wallace.
26. Officer T. Stevens Mansfield Police Department	_____/_____ Officer Stevens is a Police Officer with the Mansfield Police Department. Officer Stevens is a probable fact witness who will testify about his encounter with defendant Wallace.
27. Officer D. Baas Mansfield Police Department	_____/_____ Officer Baas is a Police Officer with the Mansfield Police Department. Officer Baas is a probable fact witness who will testify about his encounter with defendant Wallace.
28. Officer Embry Mansfield Police Department	_____/_____ Officer Embry is a Police Officer with the Mansfield Police Department. Officer Embry is a probable fact witness who will testify about his encounter with defendant Wallace.
29. Officer DeWeese Mansfield Police Department	_____/_____ Officer DeWeese is a Police Officer with the Mansfield Police Department. Officer DeWeese is a probable fact witness who will testify about his encounter with defendant Wallace.
30. Officer R. Hudson Mansfield Police Department	_____/_____ Officer Hudson is a Police Officer with the Mansfield Police Department. Officer Hudson is a probable fact witness who will testify about his encounter with defendant Wallace.

Witness Name	Sworn/Testified Subject Matter of Testimony
31. Officer K. King Arlington Police Department	_____/_____ Officer King is a Police Officer with the Arlington Police Department. Officer King is a probable fact witness who will testify about his encounter with defendant Laxson.
32. Officer Hughes Arlington Police Department	_____/_____ Officer Hughes is a Police Officer with the Arlington Police Department. Officer Hughes is a probable fact witness who will testify about his encounter with defendant Laxson.
33. Officer Dockery Arlington Police Department	_____/_____ Officer Dockery is a Police Officer with the Arlington Police Department. Officer Dockery is a probable fact witness who will testify about his encounter with defendant Laxson.
34. Officer C. Hanks Arlington Police Department	_____/_____ Officer Hanks is a Police Officer with the Arlington Police Department. Officer Hanks is a probable fact witness who will testify about his encounter with defendant Laxson.
35. Sgt. Pina Arlington Police Department	_____/_____ Sergeant Pina is a Police Officer with the Arlington Police Department. Sergeant Pina is a probable fact witness who will testify about his encounter with defendant Laxson.
36. Officer J. Laster Kennedale Police Department	_____/_____ Officer Laster is a Police Officer with the Arlington Police Department. Officer Laster is a probable fact witness who will testify about his encounter with defendant Laxson.

Witness Name	Sworn/Testified Subject Matter of Testimony
37. Officer J. Peterson Kennedale Police Department	_____/_____ Officer Peterson is a Police Officer with the Kennedale Police Department. Officer Peterson is a probable fact witness who will testify about his encounter with defendant Laxson.
38. Officer B. Guffey Fort Worth Police Department	_____/_____ Officer Guffey is a Police Officer with the Fort Worth Police Department. Officer Guffey is a probable fact witness who will testify about his encounter with defendant Windsor.
39. Officer D. Bruce Fort Worth Police Department	_____/_____ Officer Bruce is a Police Officer with the Fort Worth Police Department. Officer Bruce is a probable fact witness who will testify about his encounter with defendant Windsor.
40. Officer P. Bennett Fort Worth Police Department	_____/_____ Officer Bennett is a Police Officer with the Kennedale Police Department. Officer Bennett is a probable fact witness who will testify about his encounter with defendant Langston.
41. Officer K. Johnson Arlington Police Department	_____/_____ Officer Johnson is a Police Officer with the Arlington Police Department. Officer Johnson is a probable fact witness who will testify about his encounter with defendant Langston.
42. Officer Mayorga Arlington Police Department	_____/_____ Officer Mayorga is a Police Officer with the Arlington Police Department. Officer Mayorga is a probable fact witness who will testify about his encounter with defendant Langston.

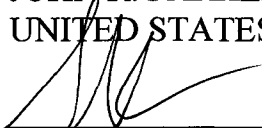
Witness Name	Sworn/Testified Subject Matter of Testimony
43. Officer Ritchie Arlington Police Department	_____/_____ Officer Ritchie is a Police Officer with the Arlington Police Department. Officer Ritchie is a probable fact witness who will testify about his encounter with defendant Langston.
44. Officer S. Warren Fort Worth Police Department	_____/_____ Officer Warren is a Police Officer with the Fort Worth Police Department. Officer Warren is a probable fact witness who will testify about his encounter with defendant Heaslet.
45. Officer T. Rawdon Fort Worth Police Department	_____/_____ Officer Rawdon is a Police Officer with the Fort Worth Police Department. Officer Rawdon is a probable fact witness who will testify about his encounter with defendant Heaslet.
46. Officer Ladd Fort Worth Police Department	_____/_____ Officer Ladd is a Police Officer with the Fort Worth Police Department. Officer Ladd is a probable fact witness who will testify about his encounter with defendant Heaslet.
47. Officer Nichols Fort Worth Police Department	_____/_____ Officer Nichols is a Police Officer with the Fort Worth Police Department. Officer Nichols is a probable fact witness who will testify about his encounter with defendant Heaslet.
48. Officer Carman Fort Worth Police Department	_____/_____ Officer Carman is a Police Officer with the Fort Worth Police Department. Officer Carman is a probable fact witness who will testify about his encounter with defendant Heaslet.

Witness Name	Sworn/Testified Subject Matter of Testimony
49. Special Agent Dendy DPS	_____/_____ Special Agent Dendy is a Special Agent with the Texas Department of Public Safety. Special Agent Dendy is a probable fact witness who will testify about his encounter with defendant Herrera.
50. Special Agent Wilson DPS	_____/_____ Special Agent Wilson is a Special Agent with the Texas Department of Public Safety. Special Agent Wilson is a probable fact witness who will testify about his encounter with defendant Herrera.
51. Special Agent Lucio DPS	_____/_____ Special Agent Lucio is a Special Agent with the Texas Department of Public Safety. Special Agent Lucio is a probable fact witness who will testify about his encounter with defendant Herrera.
52. Officer J. Darst Dallas Police Department	_____/_____ Officer Darst is a Police Officer with the Dallas Police Department. Officer Darst is a probable fact witness who will testify about his encounter with defendant Herrera.
53. Officer Emerson Dallas Police Department	_____/_____ Officer Emerson is a Police Officer with the Dallas Police Department. Officer Emerson is a probable fact witness who will testify about his encounter with defendant Herrera.

Witness Name	Sworn/Testified Subject Matter of Testimony
54. Officer J. Hopson Fort Worth Police Department	_____/_____ Officer Hopson is a Police Officer with the Fort Worth Police Department. Officer Hopson is a probable fact witness who will testify about his encounter with defendant Herrera.
55. Officer J. Bohlin Fort Worth Police Department	_____/_____ Officer Bohlin is a Police Officer with the Fort Worth Police Department. Officer Bohlin is a probable fact witness who will testify about his encounter with defendant Herrera.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

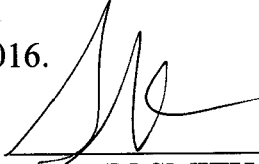


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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above Government's Witness List was this day served upon counsel for each defendant, in accordance with the provisions of Rule 49 of the Federal Rules of Criminal Procedure.

DATED this 8th day of August, 2016.

A handwritten signature in black ink, appearing to read 'Shawn Smith', is written over a horizontal line.

SHAWN SMITH
Assistant United States Attorney